

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

FISHER SCIENTIFIC COMPANY :
L.L.C., :
: PLAINTIFF : CIVIL ACTION NO. 11-200
: v. : JUDGE LANCASTER
GREG STAGGS, :
: DEFENDANT :
:

CONSENT ORDER AND AGREEMENT

This Consent Order and Agreement is entered into this 1 ST ~~1~~ day of ~~November~~
2011, by and between Plaintiff Fisher Scientific Company L.L.C. ("Fisher") and
Defendant Gregory M. Staggs ("Staggs") (collectively, the "Parties").

1. The Parties shall comply with the terms and conditions of the Settlement Agreement dated November 8, 2011 (the "Settlement Agreement"), a copy of which is attached hereto as Attachment A and incorporated herein by reference.
2. Fisher's "Proprietary and Confidential Information" is defined in the Agreement Relating to Intellectual Property, Confidential Information, Conflicts of Interest, Competitive Activities and Release (the "Agreement"), executed by and between Fisher and Staggs, attached hereto as Attachment B, which is incorporated in full herein by reference.
3. Attachment C, which is incorporated in full herein by reference, consists of a sworn Affidavit executed by Gregory M. Staggs in which he attests, *inter alia*, that he is not in possession of any of Fisher's Proprietary and Confidential Information; that,

except as set forth in his Affidavit, he did not retain, download, print, use, provide to anyone, allow anyone to review or use, or use in any way Fisher's Proprietary and Confidential Information; and that he has given his portable storage devices to his attorney, James R. Walker.

4. Failure to comply with the terms of this Consent Order and Agreement may result in a finding of contempt of court, for which any and all appropriate sanctions as determined by the Court will be imposed.

IN WITNESS WHEREOF, the parties hereto have caused this Consent Order and Agreement to be executed by their duly authorized representatives.

FISHER SCIENTIFIC COMPANY L.L.C.

By: Jeanne V. Wolfell
Title: Attorney with Zuber Callard, outside attorney
Date: November 28, 2011

GREGORY M. STAGGS

Gregory M. Staggs
Date: November 7, 2011

IT IS SO ORDERED

J. R. Lancaster
Judge Gary L. Lancaster